

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ULYSSES RODRIGUEZ CHARLES,

Plaintiff,

v.

CITY OF BOSTON, STANLEY BOGDAN,
JOHN MULLIGAN, WILLIAM KEOUGH,
PAUL RUFFO, KATHLEEN HANLEY
JOHNSON, and JOHN DOE and JANE DOE,
supervisors in the Boston Police Department,

Defendants.

C.A. No. 04-10986-NG

**ASSENTED-TO MOTION TO ENLARGE TIME
TO RESPOND TO DEFENDANTS STANLEY BOGDAN'S
AND CITY OF BOSTON'S MOTION FOR LEAVE TO AMEND**

Plaintiff Ulysses R. Charles hereby respectfully submits this assented-to motion to enlarge the period for filing a response to the Motion for Leave to Amend Answers to Plaintiff's Complaint to Add an Affirmative Defense by Defendants Stanley Bogdan and City of Boston, which was filed with the Court on August 19, 2005. Mr. Charles respectfully requests that the Court allow him until September 23, 2005 to file his response. As grounds for this motion, Mr. Charles states as follows:

1. Defendants Stanley Bogdan and City of Boston filed a Motion for Leave to Amend Answers to Plaintiff's Complaint to Add an Affirmative Defense on August 19, 2005.
2. Mr. Charles requests the enlargement of time due to the litigation and vacation schedule conflicts of his counsel.

3. Defendants Bogdan and the City of Boston assent to this motion and the relief sought herein. Accordingly, no parties will be prejudiced by the relief requested herein.

WHEREFORE, Mr. Charles respectfully requests, in the interests of justice and for all of the forgoing reasons, that the Court grant this motion and allow him until September 23, 2005 to file his response to the Motion for Leave to Amend.

DATED: September 1, 2005
Boston, MA

Respectfully submitted,

/s/ Mayeti Gametchu
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Mayeti Gametchu (BBO# 647787)
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Attorneys for Plaintiff
ULYSSES RODRIGUEZ CHARLES

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Pursuant to L.R. D.Mass. 7.1(A)(2), I, Mayeti Gametchu, hereby certify that I conferred with counsel for Defendants Stanley Bogdan and the City of Boston on August 31, 2005. Counsel for Defendants Stanley Bogdan and the City of Boston assents to the relief sought in the instant motion.

/s/ Mayeti Gametchu

CERTIFICATE OF SERVICE

I, Mayeti Gametchu, hereby certify that, on September 1, 2005, I caused a true and correct copy of the foregoing document to be served by first-class mail, postage pre-paid, upon Thomas Donohue, Esq., Assistant Corporation Counsel, City of Boston Law Dept., City Hall, Room 615, Boston, MA 02201, counsel for Defendants Stanley Bogdan and the City of Boston.

/s/ Mayeti Gametchu